

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

**OUTMEMPHIS; MICHELLE)
ANDERSON; JANE DOE 2;)
JANE DOE 3; and JANE DOE 4,)**

Plaintiffs,

v.

**BILL LEE, in his official capacity as)
Governor of Tennessee; JONATHAN)
SKRMETTI, in his official capacity as)
Attorney General and Reporter of)
Tennessee; DAVID RAUSCH, in his)
official capacity as Director of the)
Tennessee Bureau of Investigation;)
and FRANK STRADA, in his official)
capacity as Commissioner of the)
Tennessee Department of Correction,)**

Defendants.

-----)
UNITED STATES OF AMERICA,)

Plaintiff,

v.

**STATE OF TENNESSEE, and)
TENNESSEE BUREAU OF)
INVESTIGATION,)**

Defendants.

**Case Nos. 2:23-cv-2670
2:24-cv-02101**

Chief Judge Lipman

**UNOPPOSED MOTION FOR LEAVE TO FILE REPLY
IN SUPPORT OF MOTION FOR CERTIFICATION**

Defendants the State of Tennessee and the Tennessee Bureau of Investigation (“State Entities”) hereby move under Local Rule 7.2(c) for leave to file a reply in support of their Motion for Certification. DOJ filed its response to the State Entities’ Motion on June 26, 2023, making

this motion for leave due on July 3, 2024. Local Rule 7.2(c). This Court previously denied an extension of that deadline. (Dkt. 57.) Counsel for DOJ does not oppose this request for leave to reply.

The State Entities have attached a copy of their proposed Reply to this motion. The Reply does not raise new issues; it responds to the arguments made by DOJ in its response. The Reply is also well under 5 pages long when excluding the case style, signature block, and certificate of service. Local Rule 7.2(e). And it will aid the Court in resolving the issues presented by the Motion for Certification.

The Court should grant the State Entities leave to reply and direct the Clerk to file the attached Reply as the next entry on the docket.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing was filed and served via the Court's electronic filing system on this the 3rd day of July 2024, upon:

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